Staff Jurisdiction Analysis Summary City of Compton, Los Angeles County 2012-13 CalRecycle Jurisdiction Review Cycle

On August 16, 2011, CalRecycle determined that the City of Compton (City) had successfully completed all the requirements of Compliance Order IWMA BR08-02 whereby program improvements were implemented in the areas of: residential curbside, commercial, industrial, C&D, government, schools and multi-family diversion programs. Additionally, it improved public education and outreach, made hauler franchise agreement changes, and improved disposal reporting accuracy for quarterly and annual reports. In 2013, the previous hauler's franchise contract was sold to a new hauler. As a result of the transition, it has taken the new hauler about a year to assess all aspects of the City's solid waste programs in order to come up with strategies to improve programs, such as increasing education and outreach efforts. The City is now more engaged in ensuring franchise agreement requirements are being met. The new hauler is a larger company with more resources to put towards improving diversion programs. Based upon review of diversion program implementation that includes assessing program implementation into 2014 due to the transition of the haulers, LAMD staff recommends that the City is meeting the requirements of AB939. Diversion and recycled content procurement programs have been observed to be effective as summarized below:

- **Residential:** Single-family residents appear to have adequate access to recycling programs. All residents receive recycling and green waste bins as part of basic service. To address contamination the hauler places more emphasis on tagging bins and educating the residents. This increased focus has resulted in a decrease in the number of tagged carts. The City continues to face challenges regarding scavenging of recyclables. The hauler has developed new educational materials that are in English and Spanish, and is developing a new sticker that will be placed on carts. All new residential customers receive informational material about the program. The City and hauler have a residential recycling reward/recognition program linked to annual scholarships that are provided to high school seniors, for which candidates submit a paper on their views on recycling. This is a very popular program among residents because it supports students. To improve multi-family recovery, a plan is being implemented whereby the City and hauler will work to improve residential multi-family recycling. The plan, scheduled to be approved by City Council in early 2015, requires the hauler to train its staff and conduct educational outreach to apartment and condominium complexes, including assistance to set-up recycling programs at these locations. The hauler will also provide indoor recycling collection containers for residents to use in this program and meet with the City's five largest complexes (representing 40% of all multi-family units in the City) to train complex managers and residents about recycling program. LAMD staff will also work with the City in 2015 to explore opportunities that could help lower residential contamination rates and reduce scavenging.
- Commercial: To better assess the amount of recycling that is occurring the City implemented a recycling ordinance in 2012 to require businesses that are not using the franchised hauler to provide recycling tonnage information. The City provides economic incentives to businesses to encourage increased recycling and decreased trash, including commingled recycling service for no additional fee. The City requires the hauler to contact businesses and conduct waste

assessments with the top 20 percent of non-participants which has proven successful in increasing participation. For example, in 2014 following the waste assessments the hauler provided 51 recycling containers to businesses that wanted to join the program. The City and hauler have worked to reduce contamination and address illegal dumping issues. The hauler has increased education efforts with a new City-specific webpage, provided recycling information to new businesses, shared bilingual materials as appropriate and placed greater emphasis on making direct contact. The hauler has also increased tracking of contaminated bins by taking photos of the contamination then contacting the business and allowing it the opportunity to remove the contamination. Revisions to the program are planned for the second quarter of 2015 with program improvements to be implemented by June. The elements proposed by City staff include: expanding mandatory commercial recycling to serve all businesses, incorporating additional service options to meet the needs of local businesses and a review of billing rates to ensure service costs are covered and to create additional financial incentives to recycle.

- MCR: The City and hauler worked to educate commercial customers about MCR requirements using a variety of methods. Their websites provide information about the recycling program in the City. Print materials are being sent to all regulated businesses and multifamily complexes. The City plans to provide these materials to all new businesses in the future. Quarterly meetings were held with businesses and in the future more targeted direct contact, such as waste assessments, will be conducted. The City did not have a comprehensive MCR monitoring program in place initially. During the review period the previous hauler did not conduct the required monitoring. However, under the new hauler monitoring is being conducted to assess which regulated businesses and multifamily complexes are not recycling, either through the franchise hauler, third party recycling, or back-hauling, and to contact them to inform them of the law and how to recycle. The City estimated that 80% of the businesses were recycling, but did not provide an overall count of businesses subject to the law. Likewise, for 2012, it was known that 80 covered complexes were recycling, but the City did not have an overall count of multifamily complexes subject to the law. In 2013, a waste audit was conducted by the City's hauler. Through the audit it was determined that there were 557 businesses in the City subject to MCR requirement, and 203 covered businesses were not recycling. There were 396 multi-family complexes with 5 or more units, and 234 were identified to not be recycling.
- Construction & Demolition (C&D) Debris: The City has a C&D ordinance that requires all non-franchised haulers to report diversion tonnages. City staff across two departments, Water Utilities and Building & Safety, is responsible for implementing the C&D ordinance. Recently implemented ordinance changes have been made to make the process easier to understand and ensure greater permittee participation. These changes include revised documents to assist contractors in preparing a waste management plan and submitting required receipts at the end of a project, an updated preferred facility list and the availability of these outreach materials in Spanish. Additional Building Inspectors have been hired and cross-training of all field staff, to identify unpermitted projects and illegal dumping, has been conducted. In 2014, to aid in C&D recycling awareness, the City created a C&D Recycling Guide that is distributed with every permit application to clearly explain the process and all requirements.

Government: The City's in-house mixed recyclables have minimal contamination and educational signage is well placed. City's educational efforts are focused on informational signs on or near bins and a recycling program guide rather than a formal policy. Office recycling is provided deskside in all facilities with high participation. Source reduction efforts are focused on minimizing paper usage, such as all printers/copiers are set to default to duplex printing and paper must be reused. The City grasscycles and diverts other greenwaste through composting, chipping and grinding for mulch. The City's Budget Officer (currently vacant) position will soon be filled and is in charge of overseeing any changes to the City's purchasing effort. Green purchases are said to be made now but tracking is informal, so improvements are planned. The City Manager has indicated a desire to develop a more formal policy for City Council approval once the Budget Officer position is filled. The expected date for the policy to be reviewed by City Council is June/July 2015. After the City hires a new Purchasing Manager, LAMD staff will work with the City to develop additional source reduction activities.